

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TYHEE HICKMAN and SHANAY
BOLDEN, individually and on behalf of all
persons similarly situated,**

Plaintiffs,

v.

**TL TRANSPORTATION, LLC, SCOTT
FOREMAN, HERSCHEL LOWE,
AMAZON.COM, LLC, and AMAZON
LOGISTICS, INC.**

Defendants.

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: **Civil Action No. 2:17-cv-01038-GAM**
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: **Class and Collective Action**
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**PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION
AND TO FACILITATE NOTICE PURSUANT TO 29 U.S.C. § 216(b)**

Pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), Plaintiffs Tyhee Hickman and Shanay Bolden ("Plaintiffs") respectfully move this Court to enter an order conditionally certifying an FLSA collective composed of, and facilitating the sending of written notices to, all current and former Delivery Associates who were paid by TL Transportation, LLC to deliver packages for Amazon in the United States between [insert date three years prior to the date that the Court issues an Order granting Conditional Certification] and the present (the "FLSA Collective"). In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law, supporting declarations, as well as deposition testimony. Plaintiffs' proposed Notice of Collective Action Lawsuit is attached hereto as Exhibit 1. Plaintiffs' proposed Opt-In Consent Form is attached hereto as Exhibit 2.

Plaintiffs respectfully request expedited treatment of this motion, as prompt judicial notice will provide the Delivery Associates the opportunity to participate in this action while they still

have claims that are not time-barred.

WHEREFORE, Plaintiffs respectfully request this Court enter an order conditionally certifying an FLSA collective composed of, and facilitate the sending of written notices to, all persons who fall within the Proposed FLSA Collective. A proposed order is attached for the Court's consideration.

Dated: April 6, 2018

Respectfully submitted,

BERGER & MONTAGUE, P.C.

s/ Sarah R. Schalman-Bergen

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Attorneys for Plaintiffs and the Proposed Classes

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on all known parties on this 6th day of April, 2018.

s/ Sarah R. Schalman-Bergen
Sarah R. Schalman-Bergen